

**Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services**

STATEMENT OF BASIS

**White Castle Facility
Cora Texas Manufacturing Company, LLC
White Castle, Iberville Parish, Louisiana
Agency Interest Number: 1306
Activity Number: PER20090001
Proposed Permit Number: 1280-00004-V4**

I. APPLICANT

Company:

Cora Texas Manufacturing Company, LLC
P.O. Box 280
White Castle, Louisiana 70788-0280

Facility:

White Castle Facility
32505 Hwy 1
White Castle, Iberville Parish, Louisiana
Approximate UTM coordinates are 679.400 kilometers East and 3338.800 kilometers North, Zone 15

II. FACILITY AND CURRENT PERMIT STATUS

The White Castle Factory is a raw sugar mill that crushes sugar cane and produces raw sugar and final molasses. The plant is covered by Standard Industrial Classification (SIC) 2061. Sugar cane is crushed in the mill to extract its juice. Juice is then clarified and evaporated to a thick syrup, which is further concentrated to cause crystallization. Raw sugar crystals are separated from the mother liquor in centrifuges; the liquor is returned to process for additional concentration and extraction of raw sugar. After recovering as much sugar as possible from the mother liquor, the resulting final molasses is stored for sale to buyers.

Fibrous residue from the cane crushing process is called bagasse and is used to fuel steam generators specifically designed to burn this material. The steam generated is used to drive prime movers and to provide process heat for juice concentration and sugar crystallization. All bagasse boilers are equipped with multi-cyclone fly ash collectors and wet scrubbers to control emissions of particulate matter.

**White Castle Facility
Cora Texas Manufacturing Company, LLC
White Castle, Iberville Parish, Louisiana
Agency Interest Number: 1306**

The facility currently operates under permit 1280-00004-V3, which was issued on October 28, 2004. This is the Part 70 operating permit renewal and modification for the facility.

III. PROPOSED PROJECT/PERMIT INFORMATION

Application

A permit application and Emission Inventory Questionnaire were submitted by Cora Texas Manufacturing Company, LLC on March 17, 2009 requesting a Part 70 operating permit renewal and modification.

Project

With this renewal and modification, Cora Texas Manufacturing Company, LLC is requesting that the two Gasoline Storage Tanks (EQT 7 Source ID 12-92, and EQT 8 Source ID 13-92) be removed from the existing permit and replaced with a new Gasoline Storage Tank (Source 1-08). Sulfur dioxide emissions from boilers 1-6 were inadvertently omitted in previous permits and will be reconciled with this permitting action. Also, tanks will be added and removed from the insignificant activities list.

Proposed Permit

Permit 1280-00004-V4 will be the initial Part 70 operating permit renewal and modification for the White Castle facility.

Permitted Air Emissions

Estimated emissions in tons per year are as follows:

| <u>Pollutant</u> | <u>Before</u> | <u>After</u> | <u>Change</u> |
|---------------------------|---------------|--------------|---------------|
| PM ₁₀ | 206.47 | 206.47 | - |
| SO ₂ | 0.13 | 0.15 | + 0.02 |
| NO _x | 276.09 | 276.09 | - |
| CO | 238.71 | 238.71 | - |
| VOC | 17.05 | 18.31 | + 1.26 |
| Polycyclic Organic Matter | 0.19 | 0.19 | - |

**White Castle Facility
Cora Texas Manufacturing Company, LLC
White Castle, Iberville Parish, Louisiana
Agency Interest Number: 1306**

IV REGULATORY ANALYSIS

The applicability and exemptions of the appropriate regulations is straightforward and provided in the Specific Requirements section, and Section X. Table 1 and Section XI. Table 2 of the proposed permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are also provided in the Specific Requirements section of the proposed permit.

Prevention of Significant Deterioration/Nonattainment Review

This application was reviewed for compliance with Louisiana Air Quality Regulations. Non-Attainment New Source Review (NNSR), and NESHAP do not apply. Boilers No. 4, 5 and 6 shall comply with the applicable portions of New Source Performance Standards (NSPS), 40 CFR 60 Subpart Db -Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units.

The current facility meets the definition of a Major Stationary Source with respect to the Non-Attainment New Source Review (NNSR) regulations. The facility is located in an ozone nonattainment area.

This facility is a minor source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51.

MACT Requirements

The facility is a minor source of TAPs/HAPs. There are no MACT requirements.

Air Quality Analysis

Emissions associated with the proposed renewal and modification were reviewed by the Air Quality Assessment Division to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model emissions.

General Condition XVII Activities

The facility will comply with the applicable General Condition XVII Activities emissions as required by the operating permit rule. However, General Condition XVII Activities are not subject to testing, monitoring, reporting or recordkeeping requirements. For a list of approved General Condition XVII Activities, refer to the Section VIII – General Condition XVII Activities of the proposed permit.

Insignificant Activities

All Insignificant Activities are authorized under LAC 33:III.501.B.5. For a list of approved Insignificant Activities, refer to the Section IX – Insignificant Activities of the proposed permit.

**White Castle Facility
Cora Texas Manufacturing Company, LLC
White Castle, Iberville Parish, Louisiana
Agency Interest Number: 1306**

V. PERMIT SHIELD

A permit shield Per 40 CFR 60.6(f) and LAC 33:III.507.I has not been requested and is not included in the proposed permit.

VI. PERIODIC MONITORING

Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are straightforward and provided in the Specific Requirements section of the proposed permit. Boilers 1-6 are subject to 40 CFR 64, CAM, which requires monitoring of the control devices to ensure they are operating properly.

VII. GLOSSARY

Carbon Monoxide (CO) – A colorless, odorless gas, which is an oxide of carbon.

Maximum Achievable Control Technology (MACT) – The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

Hydrogen Sulfide (H₂S) – A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the reaction of acids on metallic sulfides, and is an important chemical reagent.

New Source Review (NSR) – A preconstruction review and permitting program applicable to new or modified major stationary sources of air pollutants regulated under the Clean Air Act (CAA). NSR is required by Parts C ("Prevention of Significant Deterioration of Air Quality") and D ("Nonattainment New Source Review").

Nitrogen Oxides (NO_x) – Compounds whose molecules consist of nitrogen and oxygen.

Organic Compound – Any compound of carbon and another element. Examples: Methane (CH₄), Ethane (C₂H₆), Carbon Disulfide (CS₂)

Part 70 Operating Permit – Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit: ≥ 10 tons per year of any toxic air pollutant; ≥ 25 tons of total toxic air pollutants; and ≥ 100 tons per year of

**White Castle Facility
Cora Texas Manufacturing Company, LLC
White Castle, Iberville Parish, Louisiana
Agency Interest Number: 1306**

regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

PM₁₀ – Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

Potential to Emit (PTE) – The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Prevention of Significant Deterioration (PSD) – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

Sulfur Dioxide (SO₂) – An oxide of sulfur.

Sulfuric Acid (H₂SO₄) – A highly corrosive, dense oily liquid. It is a regulated toxic air pollutant under LAC 33:III.Chapter 51.

Title V Permit – See Part 70 Operating Permit.

Volatile Organic Compound (VOC) – Any organic compound, which participates in atmospheric photochemical reactions; that is, any organic compound other than those, which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.